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August 31, 2011

VIA FACSIMILE

Hon. Paul A. Crotty United States District Court 500 Pearl Street, Room 20C New York, NY 10007-1312

Re:

Ahmad v. Hartford Life and Accident Ins. Co.

10 CV 4545 (PAC)(MHD)

Dear Judge Crotty:

We are counsel to Plaintiff in the above-referenced action. We write to request an extension to file moving briefs in support of summary judgment from September 9, 2011 to September 28, 2011. Counsel for Hartford has consented to the request. This is plaintiff's first request for an extension. (The deadline to file moving briefs was previously adjourned four times in order to complete discovery and resolve discovery disputes.)

The extension is requested because the undersigned counsel would have great difficulty filing Ahmad's moving brief by September 9, 2011 because he is preparing for an oral argument before the Second Circuit scheduled for September 12, 2011, Bendik v. Hartford Life Ins. Co., 10-2968cv

Plaintiff, therefore, requests that the Court approve the following revisions to the current Scheduling Order entered on June 23, 2011.

Current Deadline	Proposed Deadline
September 9, 2011	September 28, 2011
Contember 22 2011	Ostobor 18 2011

Moving Briefs September 9, 2011 September 28, 2011
Opposition Briefs September 23, 2011 October 18, 2011
Reply Briefs September 30, 2011 November 2, 2011

Sumant Dandling

Thank you for your consideration of this matter.

Respectfielly yours,

Scott M. Riemer

Michael Bernstein, Esq.

cc:

EDED.

HON. PAUL A. CROTTY

Proposed Deadline

UNITED STATES DISTRICT JUDGE

ENDORSE